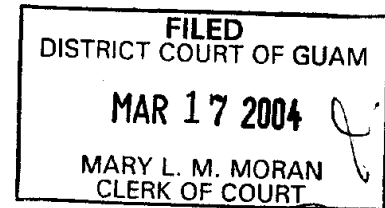


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5 Hagåtña, Guam USA 96910
6 Telephone: (671) 477-3637
7 Facsimile : (671) 472-1584



8 Attorneys for Plaintiff Shell Guam, Inc.

9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF GUAM**

12 SHELL GUAM, INC.,)	CIVIL CASE NO. CIV03-00029
13 a Guam corporation,)	
14)	
15 Plaintiff,)	
16)	DECLARATION OF STEVEN A.
17 vs.)	ZAMSKY IN SUPPORT OF
18)	APPLICATION FOR JUDGMENT
19 F/V PALAU MARU NO. 1,)	BY DEFAULT IN FAVOR OF
20)	PLAINTIFF SHELL GUAM, INC. and
21 Defendant,)	PLAINTIFF-IN-INTERVENTION
22)	RRG INTERNATIONAL, INC.
23 and)	
24)	
25 RRG INTERNATIONAL, INC.,)	
26)	
27 Plaintiff-in-Intervention.)	
28)	

I, Steven A. Zamsky, declare as follows:

1. I am an attorney admitted to practice law in Guam USA.
2. I am the attorney of record for Plaintiff Shell Guam, Inc. (hereinafter "Shell").
3. I make this Declaration in Support of the Application for Judgment by Default in favor of Shell and Plaintiff-in-Intervention RRG International, Inc. (hereinafter "RRG") against

ORIGINAL

6 Defendant F/V Palau Maru No. 1 (hereinafter "**Defendant F/V Palau Maru No. 1**") and having
7 personal knowledge of all matters set forth herein if called to testify as to said matters I could and
8 would competently do so.

9 4. Default against Defendant F/V Palau Maru No. 1 was entered on March ___, 2004.

10 5. RRG has assigned all of its claim to Shell.

11 6. Attached hereto marked **Exhibit "A"** is a printout prepared by Shell showing the
12 outstanding invoices and total amounts due on account of the Defendant F/V Palau Maru No. 1.

13 7. Attached hereto marked **Exhibit "B"** is a summary prepared by RRG showing the
14 outstanding amounts due it from Defendant F/V Palau Maru No. 1 to the extent that the amount
15 therein exceeds the prayer of RRG's Complaint-in-Intervention, for purposes hereof, such excess
16 is waived.

17 8. I have received no contact from any person, other than RRG and its counsel, with
18 regard to any potential claim with respect to the Defendant F/V Palau Maru No. 1.

19 I declare under the penalty of perjury under the laws of the United States of America that
20 the foregoing is true and correct.

21 Dated this 17 day of **March 2004**.

22
23
24
25 
26 STEVEN A. ZAMSKY

27 Z8(004.695)\PLD\P#2133

NIKKI GUAM
CORPORATION

VESSEL NAME:

PALAU MARU #1

9/21/02	5308 \$	9,698.70
9/22/02	5310 \$	4,912.18
09/22/02	2723749 \$	1,190.00
10/27/02	5382 \$	8,898.80
10/28/02	5386 \$	5,511.15
10/28/02	2724386 \$	882.00
12/15/02	5457 \$	16,285.21
12/16/02	76172 \$	1,052.00
1/28/03	5552 \$	2,491.63
2/5/03	5569 \$	13,662.47
2/5/03	3726113 \$	1,085.00
2/10/03	5583 \$	1,158.00

TOTAL

\$

66,827.14 \$

66,827.14

EXHIBIT "A"

RRG International Inc.

Mailing Address :
P.O.Box 2968 Hagatna
Guam 96932
Email : bobkkho@ite.net

1026 Cabras Highway
Guam Commercial Port
Unit 2 Warehouse # 1
Tel: 671-472 - 0888
Fax: 671-472 - 0999

SUMMARY

Palau Maru # 01 - Expenses

1.	REPAIR COST	-	\$25,000.00
2.	SUPPLY OF FISHING BAIT	-	\$48,845.00
3.	SUPPLY OF FUEL & LUB OIL	-	\$40,004.00
4.	SUPPLY CREW	-	\$56,750.00
			<hr/>
	TOTAL	-	\$170,599.00

LESS :

NET FISH SALES IN JAPAN	-	\$60,000.00
		<hr/>
Net Total	-	\$110,599.00
		<hr/> <hr/>

(Dollars One hundred ten thousand five hundred ninety nine only)



EXHIBIT "B"

RRG International Inc.

Mailing Address :
P.O.Box 2968 Hagatna
Guam 96932
Email : bobkkho@ite.net

1026 Cabras Highway
Guam Commercial Port
Unit 2 Warehouse # 1
Tel: 671-472 - 0888
Fax: 671-472 - 0999

SUMMARY

PALAU MARU # 01 - FISH SALES :

Voyage # 1	-	\$18,326.89
Voyage # 2	-	20,212.11
Voyage # 3	-	21,461.00
		<hr/>
Total	-	<u>\$60,000.00</u>

